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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

Rebecca Ann Toledo,
Plaintiff,
vs.
Kilolo Kijakazi, Acting
Commissioner of Social Security,
Defendant.

) Case No. 1:21-cv-01743-AWI-GSA

) STIPULATION AND ORDER FOR
EXTENSION OF TIME

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 30-day extension of time, from July 25, 2022 to August 24, 2022, for Plaintiff to serve on defendant with Plaintiff's Motion for Summary Judgment. Defendant will serve on Plaintiff with Defendant's Motion for Summary Judgment on or before October 11, 2022. Plaintiff may file an optional reply brief by October 26, 2022.

This is Plaintiff's second request for an extension of time. As Counsel has reported previously in many other cases in this district, Counsel for the Plaintiff underwent major orthopedic surgery on March 17, 2022. Although it has been over three months, Counsel continues to work short periods throughout the day with significant breaks throughout. Counsel continues to attend physical therapy four days a week.

Additionally, for the weeks of July 25, 2022 and August 1, 2022, Counsel for Plaintiff has seven merit briefs, and several reply briefs.

Defendant does not oppose the requested extension. Counsel apologizes to the Defendant and Court for any inconvenience this may cause.

Respectfully submitted,

Dated: June 27, 2022 PENA & BROMBERG, ATTORNEYS AT LAW

By: /s/ Jonathan Omar Pena
JONATHAN OMAR PENA
Attorneys for Plaintiff

Dated: June 27, 2022

PHILLIP A. TALBERT
United States Attorney
PETER K. THOMPSON
Acting Regional Chief Counsel, Region IX
Social Security Administration

By: **s/ Sharon Lahey*
Sharon Lahey
Special Assistant United States Attorney
Attorneys for Defendant
(*As authorized by email on June 27, 2022)

ORDER

Pursuant to stipulation, IT IS SO ORDERED.

IT IS SO ORDERED.

Dated: June 29, 2022

/s/ Gary S. Austin

UNITED STATES MAGISTRATE JUDGE